

EXHIBIT B

PROPOSED ORDER FOR ENTRY IN *PICARD V. FAIRFIELD SENTRY LTD. ET AL.*, ADV. PRO. NO. 09-01239 (SMB)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of Bernard
L. Madoff,

Plaintiff,

v.

FAIRFIELD INVESTMENT FUND LIMITED, *et al.*,

Defendants.

Adv. Pro. No. 09-01239 (SMB)

**[PROPOSED] ORDER PURSUANT TO SECTION 105(a) OF THE BANKRUPTCY
CODE AND RULES 2002 AND 9019(a) OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE APPROVING AGREEMENTS
BY AND AMONG THE TRUSTEE AND THE INDIVIDUAL DEFENDANTS**

Upon the motion (the “Motion”) of Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. § 78aaa-*III*, and the substantively consolidated estate of Bernard L. Madoff, seeking entry of an order, pursuant to 11 U.S.C. § 105(a) and Rules 2002 and 9019(a) of the Federal Rules of Bankruptcy Procedure, approving the agreements, between the Trustee and (1) Lourdes Barreneche; (2) Robert Blum; (3) Cornelis Boele; (4) Gregory Bowes; (5) Harold Greisman; (6) Jacqueline Harary,

(7) Richard Landsberger; (8) Daniel Lipton; (9) Mark McKeefry; (10) Gordon McKenzie; (11) Santiago Reyes; and (12) Andrew Smith (collectively, the "Individual Defendants"), in substantially the form annexed to the Motion (the "Agreements"); and it appearing that due and sufficient notice has been given to all parties in interest as required by Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure; and the Court having considered the Affidavit of the Trustee in support of the Motion; and it further appearing that the legal and factual bases set forth in the Motion established just cause for the relief requested; and it further appearing that this Court has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and after due deliberation; and sufficient cause appearing therefor; it is

ORDERED, that the Motion is granted in its entirety;

ORDERED, that the Agreements between the Trustee and the Individual Defendants are hereby approved and authorized;

ORDERED, that the Trustee and the Individual Defendants shall each comply with and carry out the terms of the Agreements;

ORDERED, that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order; and it is further

ORDERED, that nothing in the Agreements shall interfere with, or deprive, the Trustee and/or any third-party litigants of their rights with respect to any third-party litigations derived from the transfers underlying the Agreement.

Dated: New York, New York
_____, 2019

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE